

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

DATE: SEP 28 2007

SUBJECT: Explanation of Significant Differences for the Dayco Corporation/L.E. Carpenter Company Superfund Site, Morris County, New Jersey

FROM:

Carole Petersen, Chief

TO: New Jersey Remediation Branch



George Pavlou, Director  
Emergency & Remedial Response Division

Attached for your review and concurrence is the Explanation of Significant Differences (ESD) which details modifications to the remedy selected in the April 1994 Record of Decision (ROD) for the Dayco Corporation/L.E. Carpenter Company Superfund Site (L.E. Carpenter site or Site). The ESD documents the following changes to soil components of the remedy:

- floating product and associated smear zone soils were excavated and disposed of off-site as an alternative to the active removal system selected in the ROD due to the low yield floating product extraction system previously installed;
- bis (2-ethylhexyl) phthalate (DEHP) impacted soils were excavated and disposed of off-site instead of being consolidated into a soil treatment zone;
- no reinfiltration of treated groundwater will be performed for the purpose of treating soil contamination, as all contaminated site soils were excavated to meet the cleanup standards and disposed of off-site;
- following implementation of the source reduction remediation, all disturbed areas were restored to proposed final grades with a vegetative cover over the area of groundwater infiltration;
- excavation and off-site disposal of soils containing PCBs and lead were completed to meet the more stringent New Jersey Residential Direct Contact Soil Cleanup Criteria (RDCSCC) (0.49 ppm and 400 ppm, respectively) instead of the Non-residential Direct Contact Soil Cleanup Criteria (2.0 ppm and 600 ppm, respectively) as required by the ROD; and
- all soils above site-established cleanup levels were excavated and disposed of off-site during the source reduction remediation, instead of the excavation of some soils and on-site treatment through flushing of other soils as selected in the ROD; and environmental use restrictions on the property as selected in the ROD are no longer needed since the RDCSCC were met for PCBs and lead at the Site.



The New Jersey Department of Environmental Protection concurs with the attached ESD.

My staff and I am available to discuss this matter further with you at your convenience.

Attachment